

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ILLINOIS NATIONAL INSURANCE COMPANY;
THE INSURANCE COMPANY OF THE
STATE OF PENNSYLVANIA; NATIONAL
UNION FIRE INSURANCE COMPANY OF
PITTSBURGH, PA; and THE METROPOLITAN
TRANSPORTATION AUTHORITY,

Plaintiffs,

CASE NO. 1:11-cv-00431-PKC

v.

TUTOR PERINI CORPORATION,

Defendant.

DECLARATION OF THOMAS P. HANLEY, JR.
WITH RESPECT TO TUTOR PERINI'S MOTION TO DISMISS
OR STRIKE METROPOLITAN TRANSPORTATION AUTHORITY AS PLAINTIFF

THOMAS P. HANLEY, JR., an attorney admitted to practice in the State of New York, states under the penalty of perjury that the facts contained in this Declaration are true:

1. I am an Assistant General Counsel in the Law Department of the New York City Transit Authority (NYCTA) and am of counsel to NYCTA's General Counsel, Martin B. Schnabel, attorney for Metropolitan Transportation Authority (MTA) in this action.
2. I submit this Declaration with respect to defendant Tutor Perini Corporation's Motion to Dismiss or Strike MTA as a plaintiff in this action.
3. MTA has reviewed the First Amended Complaint in this action.
4. MTA has consented to its inclusion in this action as a named plaintiff.
5. MTA ratifies the position set forth in the First Amended Complaint.


Thomas P. Hanley, Jr.

Executed on August 1, 2011